

### REMARKS

The Final Office Action dated June 29, 2005 has been carefully reviewed and the foregoing amendment and the following remarks have been made in consequence thereof.

Claims 1-20 are pending in this application. Claims 7-20 stand rejected. Claims 1-6 have been withdrawn from consideration. Claims 7 and 13 have been amended herein. Claim 14 has been canceled herein.

The objection to the Amendment filed on July 29, 2003 under 35 U.S.C. § 132(a) is respectfully traversed.

More specifically, paragraph 13 of the specification has been properly amended to add element numbers 29, 31, and 35. Moreover, the specification has been amended to delete the alternative embodiments added to paragraphs 13 and 14 in the Amendment filed on July 29, 2003. However, although Applicants have deleted such alternative embodiments, Applicants submit that the alternative embodiments are not new matter as they were shown in Figure 1 as originally filed.

For at least the reasons set forth above, Applicants respectfully request that the objection to the Amendment filed on July 29, 2003 under Section 132 be withdrawn.

The rejection of Claim 7 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,446,439 (Kraft) is respectfully traversed.

Kraft describes a fuel nozzle system for use in a combustor for reducing nitrogen oxides and other pollutants. The fuel nozzle system includes an annular fuel distribution manifold 16 that is mounted a distance away from a diffusion nozzle 20. The annular manifold 16 includes a plurality of fuel emitting passages or holes 32 disposed along the manifold 16. The manifold 16 is mounted a distance away from the diffuser nozzle 20 to allow air to stream around the manifold 16 to facilitate mixing fuel and air, thus enhancing premixing in the combustion chamber.

Claim 7 recites a primer nozzle for a gas turbine engine combustor including a centerline axis, wherein the primer nozzle comprises, among other things, “a shroud...comprising a plurality of circumferentially-spaced openings...wherein said plurality of circumferentially-spaced openings are coupled in flow communication to a recuperator for receiving cooling air therefrom.”

Kraft does not describe or suggest a primer nozzle as is recited in Claim 7. Specifically, Kraft does not describe nor suggest a primer nozzle having a shroud including a plurality of circumferentially-spaced openings coupled in flow communication to a recuperator for receiving cooling air therefrom. For at least the reasons above, Claim 7 is submitted to be patentable over Kraft.

For at least the reasons set forth above, Applicants request that the Section 102 rejection of Claim 7 be withdrawn.

The rejection of Claims 13, 15-17, and 20 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 3,866,413 (Sturgess) in view of either U.S. Patent No. 4,041,695 (Harper) or U.S. Patent No. 3,344,602 (Davies) is respectfully traversed.

Sturgess describes an air blast fuel atomizer 1 for a gas turbine engine wherein fuel is atomized by discharging a swirling film of fuel into a swirling annular air stream of primary air. To facilitate initial engine operation, primer fuel is atomized in a throat 14 of a venture tube 15 through which an air stream is flowing. The atomized primer fuel and air are discharged from the venture tube 15 into the swirling stream of primary air (disposed within the swirling film of secondary fuel) to provide a combustible fuel-air mixture for creating a pilot combustion zone 26.

Harper describes a pneumatic purge system including an accumulator 82 for storing pressurized gas at the maximum pressure developed by a gas turbine engine compressor 14. Upon actuating a solenoid fuel shutoff valve 36 to initiate engine shutdown, stored gas from accumulator 82 flows into a fuel manifold 52 to purge fuel therefrom into a combustion chamber 18.

Davies describes a fuel purging system for a gas turbine engine. The system includes a reservoir 10 supplied with air under pressure from an engine compressor through a non-return valve 12 which closes when the compressor delivery pressure falls below that in reservoir 10. Reservoir 10 communicates with fuel lines 18 and 19 of the engine through a second non-return valve 22 and 23 which opens when the pressure in reservoir 10 exceeds that in fuel lines 18 and 19.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Sturgess, Harper, nor Davies, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Sturgess, Harper, and Davies because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a

given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is clearly based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Moreover, if art “teaches away” from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited, as a whole, is not suggestive of the presently claimed invention. Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, and to the extent understood, no combination of Sturgess, Harper, and Davies describes or suggests the claimed combination and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 13 recites a combustion system for a gas turbine engine, wherein the combustion system includes, among other things, “a combustor comprising a dome assembly and a combustor liner extending downstream from said dome assembly...a combustor casing extending around said combustor...an annular support ring...said combustor casing coupled to said annular support ring...and a primer nozzle extending axially through said annular support ring, said combustor casing, and said dome assembly...”

None of Sturgess, Harper, and Davies, considered alone or in combination, describe or suggest a combustion system as recited in Claim 13. Specifically, none of Sturgess, Harper, and Davies, considered alone or in combination, describe or suggest a combustion system including a combustor comprising a dome assembly and a combustor liner extending downstream from the dome assembly, a combustor casing extending around the combustor, an annular support ring, wherein the combustor casing is coupled to the annular support ring, and a primer nozzle extending axially through the annular support ring, the combustor casing, and the dome assembly. For at least the reasons above, Claim 13 is submitted to be patentable over Sturgess in view of either Harper or Davies.

Claims 15-17 and 20 depend from independent Claim 13. When the recitations of Claims 15-17 and 20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 15-17 and 20 likewise are patentable over Sturgess in view of either of Harper or Davies.

For at least the reasons set forth above, Applicants request that the Section 103 rejection of Claims 13, 15-17, and 20 be withdrawn.

The rejection of Claims 13, 15-18, and 20 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,530,223 (Dodds) in view of either Harper or Davies is respectfully traversed.

Harper and Davies are described above. Dodds describes a combustor 10 for a gas turbine engine. The combustor 10 has a longitudinal axis 12 extending therethrough and also includes an outer liner 14, an inner liner 16, a first dome 18 that is formed upstream of outer liner 14 and defines a first combustion zone 20 that is oriented obliquely to the longitudinal axis 12. Combustor 20 also includes a dome plate 22 connected to the first dome 18 and the inner liner 16. A second combustion zone 24 is defined by the dome plate 22, the outer liner 16, and the inner liner 14 and is orientated substantially perpendicular to the first combustion zone 20.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Dodds, Harper, nor Davies, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Dodds, Harper, and Davies because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is clearly based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Moreover, if art "teaches away" from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited, as a whole, is not suggestive of the presently claimed invention. Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, and to the extent understood, no combination of Dodds, Harper, and Davies describes or suggests the claimed combination and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 13 recites a combustion system for a gas turbine engine, wherein the combustion system includes, among other things, "a combustor comprising a dome assembly and a combustor liner extending downstream from said dome assembly...a combustor casing extending around

said combustor...an annular support ring...said combustor casing coupled to said annular support ring...and a primer nozzle extending axially through said annular support ring, said combustor casing, and said dome assembly....”

None of Dodds, Harper, and Davies, considered alone or in combination, describe or suggest a combustion system as recited in Claim 13. Specifically, none of Dodds, Harper, and Davies, considered alone or in combination, describe or suggest a combustion system including a combustor comprising a dome assembly and a combustor liner extending downstream from the dome assembly, a combustor casing extending around the combustor, an annular support ring, wherein the combustor casing is coupled to the annular support ring, and a primer nozzle extending axially through the annular support ring, the combustor casing, and the dome assembly. For at least the reasons above, Claim 13 is submitted to be patentable over Dodds in view of either Harper or Davies.

Claims 15-18 and 20 depend from independent Claim 13. When the recitations of Claims 15-18 and 20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 15-18 and 20 likewise are patentable over Dodds in view of either of Harper or Davies.

For at least the reasons set forth above, Applicants request that the Section 103 rejection of Claims 13, 15-18, and 20 be withdrawn.

The rejection of Claims 13, 15, 16, and 20 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 3,034,297 (Orchard) in view of either Harper or Davies is respectfully traversed.

Harper and Davies are described above. Orchard describes a combustion chamber for a direct lift engine. The combustion chamber includes at least three concentric annular partitions 24, 25, and 26 extending from an inlet of the chamber along the axial length of the chamber. The partitions divide the combustion chamber into at least four passages 27, 28, 29, and 30. An innermost passage 27 and an outwardly alternate passage 29 are shaped to channel air therethrough from the inlet with a swirling motion around an axis of the chamber such that the velocity is substantially unchanged.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Orchard, Harper, nor Davies, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Orchard, Harper, and Davies because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is clearly based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Moreover, if art "teaches away" from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v.



S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited, as a whole, is not suggestive of the presently claimed invention. Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, and to the extent understood, no combination of Orchard, Harper, and Davies describes or suggests the claimed combination and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 13 recites a combustion system for a gas turbine engine, wherein the combustion system includes, among other things, “a combustor comprising a dome assembly and a combustor liner extending downstream from said dome assembly...a combustor casing extending around said combustor...an annular support ring...said combustor casing coupled to said annular support ring...and a primer nozzle extending axially through said annular support ring, said combustor casing, and said dome assembly...”

None of Orchard, Harper, and Davies, considered alone or in combination, describe or suggest a combustion system as recited in Claim 13. Specifically, none of Orchard, Harper, and Davies, considered alone or in combination, describe or suggest a combustion system including a combustor comprising a dome assembly and a combustor liner extending downstream from the dome assembly, a combustor casing extending around the combustor, an annular support ring, wherein the combustor casing is coupled to the annular support ring, and a primer nozzle extending axially through the annular support ring, the combustor casing, and the dome assembly. For at least the reasons above, Claim 13 is submitted to be patentable over Orchard in view of either Harper or Davies.

Claims 15, 16, and 20 depend from independent Claim 13. When the recitations of Claims 15, 16, and 20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 15, 16, and 20 likewise are patentable over Orchard in view of either of Harper or Davies.

For at least the reasons set forth above, Applicants request that the Section 103 rejection of Claims 13, 15, 16, and 20 be withdrawn.

The rejection of Claims 7 and 12 under 35 U.S.C. § 103(a) as being unpatentable over Kraft in view of either Harper or Davies is respectfully traversed.

Kraft, Harper, and Davies are described above.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Kraft, Harper, nor Davies, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Kraft, Harper, and Davies because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection

is clearly based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Moreover, if art “teaches away” from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited, as a whole, is not suggestive of the presently claimed invention. Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, and to the extent understood, no combination of Kraft, Harper, and Davies describes or suggests the claimed combination and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 7 recites a primer nozzle for a gas turbine engine combustor including a centerline axis, wherein the primer nozzle comprises, among other things, “a shroud...comprising a plurality of circumferentially-spaced openings...wherein said plurality of circumferentially-spaced openings are coupled in flow communication to a recuperator for receiving cooling air therefrom.”

None of Kraft, Harper, and Davies, considered alone or in combination, describe or suggest a primer nozzle as recited in Claim 7. Specifically, none of Kraft, Harper, and Davies, considered alone or in combination, describe or suggest a primer nozzle having a shroud including a plurality of circumferentially-spaced openings coupled in flow communication to a recuperator for receiving cooling air therefrom. For at least the reasons above, Claim 7 is submitted to be patentable over Kraft in view of either Harper or Davies.

Claim 12 depends from independent Claim 7. When the recitations of Claim 12 are considered in combination with the recitations of Claim 7, Applicants submit that dependent Claim 12 likewise is patentable over Kraft in view of either of Harper or Davies.

For at least the reasons set forth above, Applicants request that the Section 103 rejection of Claims 7 and 12 be withdrawn.

The rejection of Claims 13, 15, 16, and 20 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 3,283,502 (Lefebvre) in view of either Harper or Davies is respectfully traversed.

Harper and Davies are described above. Lefebvre describes a fuel injection system for a gas turbine engine. The system includes an atomizing plate 12 that is located in a duct 7 leading to a combustion chamber 11. The plate 12 directs a stream of combustion gases over a periphery of the plate. A pilot fuel injector 10 is mounted in, or near, a mouth of the duct to direct fuel droplets into the combustion chamber.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Lefebvre, Harper, nor Davies, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Lefebvre, Harper, and Davies because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose

among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is clearly based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Moreover, if art “teaches away” from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited, as a whole, is not suggestive of the presently claimed invention. Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, and to the extent understood, no combination of Lefebvre, Harper, and Davies describes or suggests the claimed combination and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 13 recites a combustion system for a gas turbine engine, wherein the combustion system includes, among other things, “a combustor comprising a dome assembly and a combustor liner extending downstream from said dome assembly...a combustor casing extending around said combustor...an annular support ring...said combustor casing coupled to said annular support ring...and a primer nozzle extending axially through said annular support ring, said combustor casing, and said dome assembly...”

None of Lefebvre, Harper, and Davies, considered alone or in combination, describe or suggest a combustion system as recited in Claim 13. Specifically, none of Lefebvre, Harper, and Davies, considered alone or in combination, describe or suggest a combustion system including a combustor comprising a dome assembly and a combustor liner extending downstream from the dome assembly, a combustor casing extending around the combustor, an annular support ring, wherein the combustor casing is coupled to the annular support ring, and a primer nozzle extending axially through the annular support ring, the combustor casing,

and the dome assembly. For at least the reasons above, Claim 13 is submitted to be patentable over Lefebvre in view of either Harper or Davies.

Claims 15, 16, and 20 depend from independent Claim 13. When the recitations of Claims 15, 16, and 20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 15, 16, and 20 likewise are patentable over Lefebvre in view of either of Harper or Davies.

For at least the reasons set forth above, Applicants request that the Section 103 rejection of Claims 13, 15, 16, and 20 be withdrawn.

The rejection of Claims 7, 8, 10-13, and 15-20 under 35 U.S.C. § 103(a) as being unpatentable over Lefebvre in view of either Harper or Davies, and further in view of any of U.S. Patent No. 4,362,022 (Faucher), U.S. Patent No. 5,361,578 (Donlan), and U.S. Patent No. 4,229,944 (Weiler) is respectfully traversed.

Lefebvre, Harper and Davies are described above. Faucher describes an anti-coke fuel nozzle 10. The nozzle 10 directs air at an increased pressure into a secondary passage 14 of the nozzle 10 during an inoperative mode of the secondary passage 14, and during predefined operations of a primary fuel passage 12 to prevent coke from forming in the secondary passage 14.

Donlan describes a fuel nozzle assembly 11 that may operate using either gaseous or liquid fuel, or both simultaneously, along with steam injection. The nozzle 11 includes inner and outer concentric annular conduits 18 and 19 for directing the flow of gaseous fuel and steam from the fuel and steam inlet ports 16 and 17 to outlet ports 31. Radial passages 40 in a nozzle body 14 enable cooling air to flow over an oil nozzle 38 and through an oil outlet port 30, thus preventing coking at the nozzle tip.

Weiler describes a fuel injection nozzle assembly 1 for gas turbine drives. The nozzle assembly 1 is mounted in a structural part 9 forming an outer housing 4 of the combustion chamber of the gas turbine. Moreover, nozzle assembly 1 extends into a primary zone thereof. To prevent carbonizing of the nozzle 1, the nozzle includes cooling passages 7 and 8

that extend longitudinally therein and are in flow communication with a source of cooling air. The injection nozzle 1 includes a central body 18 having a fuel supply passage therein and an outer shielding member 17 that is positioned such that the cooling air passage is defined between the outer shielding member 17 and the central body 18. The central body 18 is formed of material having the high thermal conductivity of copper while the outer shielding member 17 is formed of a material having the high temperature resistivity and low thermal conductivity of nickel alloys.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Lefebvre, Harper, Davies, Faucher, Donlan, or Weiler, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Lefebvre, Harper, Davies, Faucher, Donlan, and Weiler because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose

among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is clearly based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Moreover, if art “teaches away” from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited, as a whole, is not suggestive of the presently claimed invention. Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, and to the extent understood, no combination of Lefebvre, Harper, Davies, Faucher, Donlan, and Weiler describes or suggests the claimed combination and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 7 recites a primer nozzle for a gas turbine engine combustor including a centerline axis, wherein the primer nozzle comprises, among other things, “a shroud...comprising a plurality of circumferentially-spaced openings...wherein said plurality of circumferentially-spaced openings are coupled in flow communication to a recuperator for receiving cooling air therefrom.”

None of Lefebvre, Harper, Davies, Faucher, Donlan, and Weiler, considered alone or in combination, describe or suggest a primer nozzle as recited in Claim 7. Specifically, none of Lefebvre, Harper, Davies, Faucher, Donlan, and Weiler, considered alone or in combination, describe or suggest a primer nozzle having a shroud including a plurality of circumferentially-spaced openings coupled in flow communication to a recuperator for receiving cooling air therefrom. For at least the reasons above, Claim 7 is submitted to be patentable over Lefebvre in view of Harper or Davies, and further in view of any of Faucher, Donlan, and Weiler.



Claims 8 and 10-12 depend from independent Claim 7. When the recitations of Claims 8 and 10-12 are considered in combination with the recitations of Claim 7, Applicants submit that dependent Claims 8 and 10-12 likewise are patentable over Lefebvre in view of Harper or Davies, and further in view of any of Faucher, Donlan, and Weiler.

Claim 13 recites a combustion system for a gas turbine engine, wherein the combustion system includes, among other things, “a combustor comprising a dome assembly and a combustor liner extending downstream from said dome assembly...a combustor casing extending around said combustor...an annular support ring...said combustor casing coupled to said annular support ring...and a primer nozzle extending axially through said annular support ring, said combustor casing, and said dome assembly...”

None of Lefebvre, Harper, Davies, Faucher, Donlan, and Weiler, considered alone or in combination, describe or suggest a combustion system as recited in Claim 13. Specifically, none of Lefebvre, Harper, Davies, Faucher, Donlan, and Weiler, considered alone or in combination, describe or suggest a combustion system including a combustor comprising a dome assembly and a combustor liner extending downstream from the dome assembly, a combustor casing extending around the combustor, an annular support ring, wherein the combustor casing is coupled to the annular support ring, and a primer nozzle extending axially through the annular support ring, the combustor casing, and the dome assembly. For at least the reasons above, Claim 13 is submitted to be patentable over Lefebvre in view of Harper or Davies, and further in view of any of Faucher, Donlan, and Weiler.

Claims 15-20 depend from independent Claim 13. When the recitations of Claims 15-20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 15-20 likewise are patentable over Lefebvre in view of Harper or Davies, and further in view of any of Faucher, Donlan, and Weiler.

For at least the reasons set forth above, Applicants request that the Section 103 rejection of Claims 7, 8, 10-13, and 15-20 be withdrawn.

The rejection of Claims 7, 8, 10-13, and 15-20 under 35 U.S.C. § 103(a) as being unpatentable over Sturgess in view of either Harper or Davies, and further in view of any of Faucher, Donlan, and Weiler is respectfully traversed.

Lefebvre, Harper, Davies, Faucher, Donlan, and Weiler are described above.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Sturgess, Harper, Davies, Faucher, Donlan, or Weiler, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Sturgess, Harper, Davies, Faucher, Donlan, and Weiler because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such

reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is clearly based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Moreover, if art “teaches away” from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited, as a whole, is not suggestive of the presently claimed invention. Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, and to the extent understood, no combination of Sturgess, Harper, Davies, Faucher, Donlan, and Weiler describe or suggest the claimed combination and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 7 recites a primer nozzle for a gas turbine engine combustor including a centerline axis, wherein the primer nozzle comprises, among other things, “a shroud...comprising a plurality of circumferentially-spaced openings...wherein said plurality of circumferentially-spaced openings are coupled in flow communication to a recuperator for receiving cooling air therefrom.”

None of Sturgess, Harper, Davies, Faucher, Donlan, and Weiler, considered alone or in combination, describe or suggest a primer nozzle as recited in Claim 7. Specifically, none of Sturgess, Harper, Davies, Faucher, Donlan, and Weiler, considered alone or in combination, describe or suggest a primer nozzle having a shroud including a plurality of circumferentially-spaced openings coupled in flow communication to a recuperator for receiving cooling air therefrom. For at least the reasons above, Claim 7 is submitted to be patentable over Sturgess in view of Harper or Davies, and further in view of any of Faucher, Donlan, and Weiler.

Claims 8 and 10-12 depend from independent Claim 7. When the recitations of Claims 8 and 10-12 are considered in combination with the recitations of Claim 7, Applicants submit that dependent Claims 8 and 10-12 likewise are patentable over Sturgess in view of Harper or Davies, and further in view of any of Faucher, Donlan, and Weiler.

Claim 13 recites a combustion system for a gas turbine engine, wherein the combustion system includes, among other things, “a combustor comprising a dome assembly and a combustor liner extending downstream from said dome assembly...a combustor casing extending around said combustor...an annular support ring...said combustor casing coupled to said annular support ring...and a primer nozzle extending axially through said annular support ring, said combustor casing, and said dome assembly....”

None of Sturgess, Harper, Davies, Faucher, Donlan, and Weiler, considered alone or in combination, describe or suggest a combustion system as recited in Claim 13. Specifically, none of Sturgess, Harper, Davies, Faucher, Donlan, and Weiler, considered alone or in combination, describe or suggest a combustion system including a combustor comprising a dome assembly and a combustor liner extending downstream from the dome assembly, a combustor casing extending around the combustor, an annular support ring, wherein the combustor casing is coupled to the annular support ring, and a primer nozzle extending axially through the annular support ring, the combustor casing, and the dome assembly. For at least the reasons above, Claim 13 is submitted to be patentable over Sturgess in view of Harper or Davies, and further in view of any of Faucher, Donlan, and Weiler.

Claims 15-20 depend from independent Claim 13. When the recitations of Claims 15-20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 15-20 likewise are patentable over Sturgess in view of Harper or Davies, and further in view of any of Faucher, Donlan, and Weiler.

For at least the reasons set forth above, Applicants request that the Section 103 rejection of Claims 7, 8, 10-13, and 15-20 be withdrawn.

The rejection of Claim 9 under 35 U.S.C. § 103(a) as being unpatentable over Lefebvre or Sturgess in view of either Harper or Davies, in view of any of Faucher, Donlan, and Weiler, and in view of either of U.S. Patent No. 6,675,581 (Stuttaford) or U.S. Patent No. 6,363,724 (Bechtel) is respectfully traversed.

Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, and Weiler are described above. Stuttford describes a premix fuel nozzle and method of operation for use in a gas turbine combustor. The premix fuel nozzle utilizes a fin assembly comprising a plurality of radially extending fins for injection of fuel and pressurized air in order to provide a more uniform injection pattern. The fuel and pressurized air mixes upstream of the combustion chamber and flows into the combustion chamber as a homogeneous mixture. The premix fuel nozzle includes a plurality of coaxial passages, which provide fuel and pressurized air to the fin assembly, as well as pressurized air to cool the nozzle cap assembly.

Bechtel describes a diffusion flame nozzle gas tip to convert a dual fuel nozzle to a gas only nozzle. The nozzle tip diverts compressor discharge air from the passage feeding the diffusion nozzle air swirl vanes to a region vacated by removal of the dual fuel components, so that the diverted compressor discharge air can flow to and through effusion holes in the end cap plate of the nozzle tip.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttford, nor Bechtel, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Sturgess, Lefebvre, Harper, Davies, Faucher, Donlan, Weiler, Stuttford, and Bechtel because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art,

and not based on Applicants' disclosure. In re Vaeck , 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is clearly based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Moreover, if art "teaches away" from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited, as a whole, is not suggestive of the presently claimed invention. Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, and to the extent understood, no combination of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, and Bechtel describes or suggests the claimed combination and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 9 depends from Claim 7, which recites a primer nozzle for a gas turbine engine combustor including a centerline axis, wherein the primer nozzle comprises, among other things, "a shroud...comprising a plurality of circumferentially-spaced openings...wherein said plurality of circumferentially-spaced openings are coupled in flow communication to a recuperator for receiving cooling air therefrom."

None of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, and Bechtel, considered alone or in combination, describe or suggest a primer nozzle as recited in

Claim 7. Specifically, none of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, and Bechtel, considered alone or in combination, describe or suggest a primer nozzle having a shroud including a plurality of circumferentially-spaced openings coupled in flow communication to a recouperator for receiving cooling air therefrom. For at least the reasons above, Claim 7 is submitted to be patentable over Lefebvre or Sturgess in view of Harper or Davies, in view of any of Faucher, Donlan, and Weiler, and in view of either of Stuttaford or Bechtel.

Claim 9 depends from independent Claim 7. When the recitations of Claim 9 are considered in combination with the recitations of Claim 7, Applicants submit that dependent Claim 9 likewise is patentable over Lefebvre or Sturgess in view of Harper or Davies, in view of any of Faucher, Donlan, and Weiler, and in view of either of Stuttaford or Bechtel.

For at least the reasons set forth above, Applicants request that the Section 103 rejection of Claim 9 be withdrawn.

The rejection of Claim 14 under 35 U.S.C. § 103(a) as being unpatentable over any of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, and Bechtel in view of U.S. Patent No. 2,529,958 (Owner) or U.S. Patent No. 3,116,606 (Dougherty) is respectfully traversed.

Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, and Bechtel are described above. Owner describes means for supporting a gas turbine power-plant that is attached to the power-plant at positions spaced along the length thereof. A portion of the plant is supported cantileverwise of the means and another portion is supported between the attachments.

Dougherty describes a combustion can support for supporting the forward end of the combustion can prior to insertion of a fuel nozzle. The support eliminates the usual supports at the rear of the can and thereby renders the can lighter and cheaper to manufacture.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by

combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttford, Bechtel, Owner, nor Dougherty, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Sturgess, Lefebvre, Harper, Davies, Faucher, Donlan, Weiler, Stuttford, Bechtel, Owner, and Dougherty because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is clearly based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Moreover, if art "teaches away" from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v.



S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited, as a whole, is not suggestive of the presently claimed invention. Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, and to the extent understood, no combination of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, Bechtel, Owner, and Dougherty describes or suggests the claimed combination and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 14 depends from Claim 13, which recites a combustion system for a gas turbine engine, wherein the combustion system includes, among other things, “a combustor comprising a dome assembly and a combustor liner extending downstream from said dome assembly...a combustor casing extending around said combustor...an annular support ring...said combustor casing coupled to said annular support ring...and a primer nozzle extending axially through said annular support ring, said combustor casing, and said dome assembly....”

None of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, Bechtel, Owner, and Dougherty, considered alone or in combination, describe or suggest a combustion system as recited in Claim 13. Specifically, none of Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, Bechtel, Owner, and Dougherty, considered alone or in combination, describe or suggest a combustion system including a combustor comprising a dome assembly and a combustor liner extending downstream from the dome assembly, a combustor casing extending around the combustor, an annular support ring, wherein the combustor casing is coupled to the annular support ring, and a primer nozzle extending axially through the annular support ring, the combustor casing, and the dome assembly. On page 13 of the Final Office Action, the Examiner asserts that Owner teaches an annular support ring having a combustor casing couple thereto, and that Dougherty teaches a combustor casing with flanges but not circumferentially spaced beams. However, in contrast to the present invention, Owner describes a structure for supporting a gas turbine engine compressor, while Dougherty describes a combustion can coupled to an annular outer engine case. Accordingly, neither Owner nor Dougherty, considered alone or in combination, describe or suggest a combustor casing coupled to an annular support ring, much less wherein

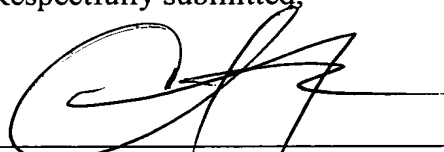
a primer nozzle extends axially through an annular support ring, a combustor casing, and a dome assembly. None of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, and Bechtel, considered alone or in combination, make up for the deficiencies of Owner and Dougherty. For at least the reasons above, Claim 13 is submitted to be patentable over any of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, and Bechtel in view of Owner or Dougherty.

Claim 14 depends from independent Claim 13. When the recitations of Claim 14 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claim 14 likewise is patentable over any of Lefebvre, Sturgess, Harper, Davies, Faucher, Donlan, Weiler, Stuttaford, and Bechtel in view of Owner or Dougherty.

For at least the reasons set forth above, Applicants request that the Section 103 rejection of Claim 14 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'CH Livingston', written over a horizontal line.

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